

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE**

MICHELLE TORRES, *et al.*, on behalf of  
themselves and those similarly situated,

Plaintiffs,

v.

W. DOUGLAS COLLINS, in his official  
capacity as Hamblen County General  
Sessions Judge, *et al.*,

Defendants.

Case No. 2:20-cv-00026-DCLC-CRW

(Class Action)

**PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR  
ATTORNEYS' FEES AND NONTAXABLE EXPENSES**

Pursuant to Local Rule 54.2, Plaintiffs hereby submit this motion for an extension of time to file their motion for attorneys' fees and nontaxable expenses.

On February 13, 2025, this Court entered an amended final judgment granting Plaintiffs declaratory and injunctive relief. ECF No. 247. The remaining issues to be resolved are Plaintiffs' attorneys' fees and costs as prevailing parties. *See* 42 U.S.C. 1988(b); Loc. R. 54.2.

Plaintiffs request an extension of time to file their motion due to the time required to gather and review the applicable records in this litigation, which has spanned more than five years, and include records for attorneys who are no longer employed by the organizations that represent Plaintiffs. Additional time would also allow the Parties to confer about a potential resolution for the fees matter without incurring significant additional expenses to litigate reasonable fees. The Parties also have not reached final decisions on whether either side intends to appeal this Court's final judgment. In the event that either side appeals, the most efficient course would be to defer

Plaintiffs' deadline to file a motion for attorneys' fees and nontaxable expenses until resolution of any appeal.

Accordingly, Plaintiffs request that their deadline for filing a motion for attorneys' fees and nontaxable expenses be extended 30 days to April 16, 2025. In the event that either side files a notice of appeal, Plaintiffs request that their deadline be extended until 30 days after the Sixth Circuit's mandate issues.

Dated: March 10, 2025

Respectfully Submitted,

/s/ Seth Wayne

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(admitted *pro hac vice*)

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### **CERTIFICATE OF SERVICE**

I hereby certify that on the 10th day of March, 2025, I electronically filed the foregoing with the clerk of the court for the U.S. District Court, Eastern District of Tennessee, using the electronic case filing system of the Court. This filing will be served in accordance with the Federal Rules of Civil Procedure.

/s/ Seth Wayne